

**IN THE UNITED STATES
DISTRICT COURT DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

JORGE VALDEZ and)	
FRANCES F. VALDEZ,)	
individually and as husband and)	
wife)	
)	MDL NO. 2873
)	
Plaintiff,)	Master Docket No: 218-mn-2873
)	
)	JUDGE RICHARD GERGEL
v.)	
)	Civil Action No: 2:22-cv-00455-RMG
3M COMPANY; CHEMGUARD, INC.;)	
MATLICK ENTERPRISES, INC.)	
(d/b/a UNITED FIRE EQUIPMENT)	
COMPANY); PERIMETER)	
SOLUTIONS, LP; TYCO FIRE)	
PRODUCTS, LP)	
)	
Defendants.)	

STIPULATION FOR SUBSTITUTION OF PARTIES

Plaintiff Frances F. Valdez and defendants, through Co-Lead Defense Counsel as identified in Case Management Order No. 2, stipulate as follows:

1. Plaintiff, Jorge Valdez, died on May 17, 2023 and is survived by his wife Frances F. Valdez.
2. Frances F. Valdez is the representative of Mr. Valdez's estate.
3. A Suggestion of Death was timely filed into the record on May 26, 2023. *See* R. Doc. 3211.
4. Under A.R.S. § 14-3110, Jorge Valdez's claims survive his death.
5. Frances F. Valdez maintains her loss of consortium claim in the above captioned matter.

6. As personal representative, Frances F. Valdez has standing under the circumstances of this case to prosecute this action on behalf of the estate of the decedent and is therefore substituted as Plaintiff for Jorge Valdez.

Dated: August 1, 2023

/s/ Jason W. Burge

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CERTIFICATE OF SERVICE

I hereby certify that on this day 3rd day of August, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a copy of the foregoing pleading to all counsel of record by notice of electronic filing.

/s/ Jason W. Burge